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October 15, 2021

Honorable Alison J. Nathan
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Ghislaine Maxwell*
20 Cr. 330 (AJN)

Dear Judge Nathan:

The Government's letter concerning delayed delivery of Ghislaine Maxwell's legal mail (Dkt. 350) merely parrots the MDC's standard excuses, adding a BOP version of "my dog ate my homework." The response is woefully inadequate and makes light of the MDC's encroachment on Ms. Maxwell's ability to prepare for trial and confer with counsel. It does not explain MDC's failure to respond to counsel's requests. It utterly fails to address the issue regarding the extremely late delivery of legal mail placed by counsel in the legal mailbox on October 2 but not discovered until October 7; nor the presence of a sticker with a bar code of the type issued by the U.S. Post Office and unfamiliar to the Warden and Unit Manager.

If it is not too burdensome for the MDC to rotate in extra officers from BOP facilities nationwide to overmanage and monitor Ms. Maxwell's every move and every second she confers with counsel in the visiting room, the MDC should be able to deliver legal mail in a timely fashion. It is not surprising that the Government asserts that this case and the circumstances do not merit special expedited delivery. It dug its heels in when making it clear that it would not go out of its way to have the hard drive hand delivered to the MDC to ensure that Ms. Maxwell would receive it expeditiously, an accommodation it had previously made.

It is time for the Government and the Court to seriously reconsider Ms. Maxwell's detention. This situation is untenable, unreasonable, and usurping Ms. Maxwell's constitutional rights.

Very truly yours,

/s/

BOBBI C. STERNHEIM

cc: All counsel